

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

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CA name and address:

Town of Arlington
P.O. Box 507
Arlington, TN 38002

Date(s) of PCI

April 18, 2017

Period covered by PCI

April 2016 – March 2017

PIRT / DSS incorporated in NPDES permit?

Yes No

INSPECTOR (S)

Name	Title/Affiliation	Telephone Number
Eddy Bouzeid	EPS3/TDEC/DWR/MEFO	901-371-3023

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Andy Wehl	Pretreatment Coordinator *	901-867-1782
Terry Perkins	WWTP Manager	901-867-1782

*Identified program contact

ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FTE	Full-time equivalent
FWA	Flow-weighted average
gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical review criteria
TTO	Total toxic organics
WENDB	Water Enforcement National Data Base

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS			
FILE <u> 1 </u> Industry name and address <div style="text-align: center;"> Mid-South Septic Service 11284 Gulfstream Road Arlington, TN 38002 </div>	Total flow (gpd) <div style="text-align: center;">120,000 gpd</div>	Process flow (gpd) <div style="text-align: center;">120,000 gpd</div>	Type of industry (products manufactured) -Treat septic tank wastes from residential customers -treat grease trap/interceptor waste from food service establishments
Industry visited during PCI Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments <div> Discharge permit became effective January 1, 2016. Discharge permit expires midnight December 31, 2019. </div>			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS				
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)	
		Type of industry (products manufactured)		
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/>	SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments				

NARRATIVE COMMENTS				
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)	
		Type of industry (products manufactured)		
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/>	SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments				

[illegible]

SECTION I: IU EVALUATION (Continued)

Mid-South Septic					INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.	
	File	File	File	File		
	1	—	—	—		—
	IU FILE REVIEW					
	A. CA NOTIFICATION OF IU					
✓					1. Notification of classification or change in classification	403.8(f)(2)(iii)
✓					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
Comments						

SECTION I: IU EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
					a. Statement of duration (≤ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
					• Identification of pollutants to be monitored	
					• Info on waiver if allowing a waiver for pollutant not present or expected to be present (for CIUs only)	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results)	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan, if determined by the POTW to be necessary.	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Comments</div>						

SECTION I: IU EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
NA					a. Involve the same or similar operations	
NA					b. Discharge the same types of wastes	
NA					c. Require the same effluent limitations	
NA					• Contact information	
NA					• Production processes	
NA					• Types of waste generated	
NA					• Location for monitoring all wastes covered by the general permit	
NA					e. Documentation to support the POTW's determination	
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Comments</div>						

SECTION I: IU EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
✓					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
✓					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
✓					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
					5. Calculation and application of production based-standards	403.6(c)
					6. Calculation and application of CWF or FWA	403.6(d)&(e)
					7. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION I: IU EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	
✓					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
NA					1. Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
					2. Sampling at frequency specified in approved program	
✓					3. Documentation of sampling activities	403.8(f)(2)(vi)
✓					4. Analysis for all regulated parameters	
✓					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
✓					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
NA					2. Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
✓					7. Inspection at frequency specified in approved program	
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
✓					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments						

SECTION I: IU EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
✓					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)
Comments						

SECTION I: IU EVALUATION (Continued)

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					F. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
✓					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓					2. Analysis of all required pollutants	403.12(g)(1)&(h)
✓					3. Submission of BMR/90-day report	403.12(b) &(d)
1					4. Periodic self monitoring reports	403.12(e)&(h)
✓					5. Reporting all required pollutants	403.12(g)(1)&(h)
2					6. Signatory/certification of reports	403.12(l)
					7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
✓					<ul style="list-style-type: none"> • Discharge violation • Slug load • Accidental spill 	
					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					11. Notification of hazardous waste discharge	403.12(j)&(p)
					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
NA	NA	NA			13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(viii)
NA	NA	NA			a. Chronic violations	
NA	NA	NA			b. TRC	
NA	NA	NA			c. Pass through or interference	403.5(a)(1)
NA	NA	NA			<ul style="list-style-type: none"> • Spill or slug load 	403.12(f)
NA	NA	NA			d. Other discharge violations (specify)	
					Reporting	
NA	NA	NA			15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(viii)
NA	NA	NA			16. SNC with reporting requirements	403.8(f)(2)(viii)
Comments						
<p>1. IU failed to sample in March 2017. Report was not submitted for the month. NOV was issued. IU resampled within 30 days.</p> <p>2. Reports submitted to CA were not signed/certified. CA was made aware of the deficiency.</p>						

SECTION I: IU EVALUATION (Continued)

File _____	File _____	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
					G. OTHER	
Comments						

SECTION I COMPLETED BY: Eddy Bouzeid	DATE: 4-18-2017
TITLE: EPS3	TELEPHONE: 901-371-3023

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

		Yes	No
1.	a. Did the CA make substantial changes to the pretreatment program recently? (e. g., definitions, limits)?	✓	
	b. Were the changes approved by TDEC?	✓	

Describe any recent changes that have been implemented.

- Nashville approved revised Legal Authority (SUO and ERP).
- CA published SUO and ERP on April 1, 2017. Comment(s) period ends on May 12, 2017.
- Nashville will give final approval of Legal Authority upon receipt of public comments' information.
- CA will subsequently adopt approved Legal Authority.

		Yes	No
2.	Is the CA in the process of making any substantial changes to the pretreatment program (including legal authority, local limits, streamlining requirements, etc.)?	✓	

If yes, describe.

- CA awaiting final approval of Legal Authority (see above).
- Local limits and plant protection criteria were revised and approved by Nashville.
- All discharge permits will be revised once Legal Authority is adopted by CA.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

- CA updates IWS every five years (upon permit reissuance).
- CA acquires list of all IUs from City Hall
- CA submits short form to all IUs.
- CA checks water bills.

2. How many IUs are currently identified by the CA in each of the following groups?

a.

4

 SIUs (as defined by the CA) [WENDB - SIUS]

2

 CIUs [WENDB - CIUS]

0

 Noncategorical SIUs**

b.

--

 Other permitted nonsignificant IUs

c.

4

 TOTAL

d.

0

 NSCIUs** (as defined by 40 CFR 403.3(v)(2))

List NSCIUs:

** A NSCIU never discharges more than 100 gpd of total categorical wastewater (excluding, noncontact cooling and boiler blowdown wastewater) and the following conditions are met:

- o Discharger consistently complied with all applicable categorical requirements
- o Discharger submits annual certification statement required in 40 CFR 403.12(q)
- o Discharger never discharges any untreated concentrated wastewater.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1.	<p>a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism ?</p> <p style="margin-left: 40px;">IUs are: Rich Products, Mid-South Septic Service, Wright Medical and MicroPort Orthopedics.</p>	4
	<p>b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism?</p> <p style="margin-left: 40px;">List SIUs:</p>	0
	<p>c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II]</p> <p style="margin-left: 40px;">If any, explain.</p>	0
2.	<p>How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism ? [RNC - II]</p> <p style="margin-left: 40px;">If any, explain.</p>	0

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs have not been evaluated for the need to develop slug discharge control plans*? 0
[403.8(f)(2)(vi)]

b. List the SIUs below or attach additional sheets as needed.

* For dischargers identified as significant prior to November 14, 2005, this evaluation must be performed at least once by October 14, 2006. Additional SIUs must be evaluated within 1 year of being designated as a SIU.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW ?

- CA does not accept any hauled waste to the POTW.

If yes, identify the industries.

If no, explain.

N/A	Yes	No
✓		

3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

If yes, identify and explain.

Yes	No
	✓

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS			
1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs	1/year	1/year	
• NSCIUs	NA	NA	
• Other SIUs	1/year	1/year	
b. Sampling (by CA)			
• CIUs	1/year	2/year	
• NSCIUs	NA	NA	
• Other SIUs	1/year	2/year	
c. Self – Monitoring			
• CIUs	Quarterly	Quarterly	pH and Flow monthly
• Other SIUs	1/month	1/month	
d. Reporting			
• CIUs	1/month	1/month	
• NSCIUs	NA	NA	
• Other SIUs	1/month	1/month	
2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [WENDB - NOIN] [RNC - II]			
a. Not sampled at least once	0		0%
b. Not inspected at least once	0		0%
If any, explain.			
3. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation?			
NA.			
4. Does the CA use Best Management Practices (BMP) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?			
NA.			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

- a. Notice or letter of violation
- b. Administrative orders
- c. Administrative fines
- d. Show cause hearings
- e. Compliance schedules
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of services
- j. Other (specify)

Explain if appropriate

N/A	Yes	No
	✓	

2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC - II]

N/A	Yes	No
	✓	

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period April 2016 – March 2017

0	0%	Applicable pretreatment standards
0	0%	Applicable reporting requirements
0	0%	Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

	Yes	No
4. Did the CA publish all SIUs in SNC in a newspaper of general circulation that provides meaningful public notice within the jurisdictions(s) served by the POTW in accordance with NPDES permit requirements? [403.8(f)(2)(viii)]		✓

5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB - SINN]	0
---	---

6. a. Did the CA experience any of the following caused by industrial discharges?	
---	--

- Interference
- Pass through
- Fire or explosions (flashpoint, etc.)
- Corrosive structural damage
- Flow obstruction
- Excessive flow rates
- Excessive pollutant concentrations
- Heat problems
- Interference due to O&G
- Toxic fumes
- Illicit dumping of hauled wastes
- Worker health and safety
- Other (specify)

Yes	No	Unk	Explain
✓			
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		

- b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

Yes	No
	✓

- CA could not pinpoint the source of the interference to one specific IU. However, the interference was corrected.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

7.	a. How many SIUs are on compliance schedules?	0
	b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).	
	SIU	End Date

8.	Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] If yes, identify and explain.	Yes	No
			✓

9.	a. Were any SIUs in noncompliance since the last pretreatment inspection by TDEC?	Yes	No
	b. If yes, what enforcement was taken?		✓
	c. Have they returned to compliance?		
	d. If not, what is the CA doing to bring the SIU back into compliance?		

G. ADDITIONAL EVALUATIONS

SECTION II COMPLETED BY: Eddy Bouzeid	DATE: 4-18-2017
TITLE: EPS3	TELEPHONE: 901-371-3023
POTW REPRESENTATIVE: Terry Perkins	DATE: 4-18-2017
PROVIDING RESPONSES: Plant Manager	TELEPHONE: 901-867-1782

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ATTACHMENT A
PRETREATMENT PROGRAM STATUS UPDATE

PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. It should be updated prior to each audit based on information obtained from the most recent PCI and / or audit and the last pretreatment program performance report

A. CA INFORMATION

1. CA name Arlington STP

2. a. Pretreatment contact
Terry Perkins

b. Mailing address
P.O. Box 507
Arlington, TN 38002

c. Title Pretreatment Coordinator

d. Telephone number 901-867-1782

3. Date of last CA report to Approval Authority CA mailed SAR on April 17, 2017

4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action ?

Yes

No

✓

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

TSS, ammonia and E. Coli

Equipment failure, potential slug discharge.

b. Has the treatment plant had any violations of biosolids regulations?

No

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

- a. Program modification
- b. Legal authority
- c. Local limits
- d. IU characterization
- e. Control mechanism
- f. Application of pretreatment standards
- g. Compliance monitoring
- h. Enforcement program
- i. Data management
- j. Program resources
- k. Other (specify)

Last PCI	Last Audit	Program Report
Date: 9-21-2015	Date:	Date:
✓		
✓		
✓		
✓		
✓		

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS							
2. Is the CA presently in RNC for any of these violations ? a. Failure to enforce against pass through and / or interference [RNC - I] [SNC] b. Failure to submit required reports within 30 days [RNC - I] [SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC - I] [SNC] d. Failure to issue / reissue control mechanisms to 90 percent of SIUs within 6 months [RNC - II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC - II] f. Failure to enforce standards and reporting requirements [RNC - II] g. Other (specify) [RNC - II]	Data Source	Yes	No				
			✓				
			✓				
			✓				
			✓				
			✓				
			✓				
			✓				
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)							
Name of SIU in SNC	Compliance Status	Source					
None							
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.							
		SNC Evaluation Period	Apr 16-Mar 17				
0	0 %	Applicable pretreatment standards					
0	0 %	Applicable reporting requirements					
0	0 %	Pretreatment compliance schedules					
		*SNC defined by: <table border="1" style="float: right; margin-top: 5px;"> <tr> <td style="width: 50%; padding: 2px;">POTW</td> <td style="width: 50%;"></td> </tr> <tr> <td style="padding: 2px;">EPA</td> <td></td> </tr> </table>		POTW		EPA	
POTW							
EPA							
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment Program NA.							

ATTACHMENT A COMPLETED BY: Eddy Bouzeid TITLE: EPS3	DATE: 4-18-2017 TELEPHONE: 901-371-3023
--	--

ATTACHMENT C

WORKSHEETS

- **IU SITE VISIT DATA SHEET**
- **WENDB DATA ENTRY WORKSHEET**
 - **RNC WORKSHEET**

IU SITE VISIT REPORT FORM

III. IU SITE VISIT REPORT FORM

INSTRUCTIONS: Use this form to record observations made during the site visit and findings based on the site visit. Please provide as much detail as possible.

Name of industry and city

Mid-South Septic Service
11284 Gulfstream Road
Arlington, TN 38002

Date of visit 4-18-2017

Time of visit

11:00 AM

Name(s) of inspector(s)

Eddy Bouzeid

Provide name(s) and title(s) of industry representative(s)

Name

Title

Mike Jones

Owner

1. What does this industry produce ?

Septic and grease hauler.

2. How is this industry classified by the POTW ? Is this classification correct?

SIU.

Yes.

3. Have there been any significant changes in processes or flow ?

Less grease in waste stream. No change in the flow.

4. What raw materials are used ?

Polymer and lime.

IU SITE VISIT REPORT FORM (CONTINUED)

5. What processes are used to make the product(s) ? (Attach a step by step diagram if possible.)

Mix polymer with septic waste and haul solids to landfill.

6. Where is water used and what is the source of the water (city, well, river, etc.) ?

City water added to polymer.

7. Describe the processes that discharge wastewater.

Dewatering of septic waste and polymer.

IU SITE VISIT REPORT FORM (CONTINUED)

8. Describe the sample location. Are the CA and industry using the same location ?

Manhole in the back of the facility.

Yes.

9. Describe the treatment system which is in place.

pH adjustment.

IU SITE VISIT REPORT FORM (CONTINUED)

10. What chemicals are maintained onsite ? How are they stored ? Is adequate spill prevention in place?

Polymer.

55-gal drums.

Yes.

11. Are any hazardous wastes stored or discharged ?

No.

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY: Eddy Bouzeid

TITLE: EPS3

DATE: 4-18-2017

TELEPHONE: 901-371-3023

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name Arlington STP		
NPDES number TN0078603		
Date of audit April 18, 2017		
	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	4
• Number of CIUs	II.B.2.a.	2
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	0
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	0
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	0
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	0
- SIUs on Schedules	II.F.7.	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."		
**As defined in 40 CFR 403.8(f)(2)(viii).		

WENDB DATA ENTRY WORKSHEET COMPLETED BY: Eddy Bouzeid TITLE: EPS3	DATE: 4-18-2017 TELEPHONE: 901-371-3023
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RNC WORKSHEET

III. RNC WORKSHEET

INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.

CA name **Arlington STP**

NPDES number **TN0078603**

Date of audit **April 18, 2017**

		Level	Checklist Reference
<input type="checkbox"/> None	Failure to enforce against pass through and / or interference	I	II.G.6
<input type="checkbox"/> None	Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/> None	Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
<input type="checkbox"/> None	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<input type="checkbox"/> None	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<input type="checkbox"/> None	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<input type="checkbox"/>	Other (specify)	II	

SNC

<input type="checkbox"/> None	CA in SNC for violation of any Level I criterion
<input type="checkbox"/> None	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: **Eddy Bouzeid**
TITLE: **EPS3**

DATE: **4-18-2017**
TELEPHONE: **901-371-3023**